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GOVERNMENT
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5. Upon information and belief, many circulators were paid on a per-signature basis to circulate petitions in the 22nd Senate District.

6. Upon information and belief, the circulators sometimes directed additional individuals to collect signatures, also paying on a per-signature basis.

7. Upon information and belief, certain circulators provided false addresses in the certifications executed on the recall petitions that they submitted.

8. Upon information and belief, certain circulators executed certifications on recall petitions that they did not personally circulate.

9. Upon information and belief, certain circulators obtained signatures from Wisconsin electors by misrepresenting the purpose of the recall petition.

10. Upon information and belief, certain circulators forged signatures on petitions.

11. Upon information and belief, the systemic impropriety utilized in obtaining purported signatures is so pervasive that it invalidates each of the implicated signatures, contradicts the circulators' certification, and invalidates all petitions purportedly obtained by numerous circulators.

12. Upon information and belief, the Recall Petition includes the following irregularities, which are supported by the Affidavit of Michael L. Pfohl, attached hereto:

- a. At least 132 signatories to the Recall Petition did not date their signatures, dated their signatures outside the purported circulation period, or signed the Recall Petition subsequent to the respective circulator's certification period. Pursuant to Wis. Stat. § 9.10(2)(e)1-3, these signatures may not be counted.
- b. The residency of at least 482 signatories to the Recall Petition cannot be determined by the address given. Pursuant to Wis. Stat. § 9.10(2)(e)4, these signatures may not be counted.

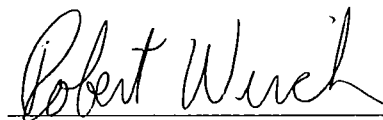
- c. At least 523 signatories to the Recall Petition reside outside of the 22nd Senate District. Pursuant to Wis. Stat. § 9.10(2)(e)5, these signatures may not be counted.
- d. At least 31 signatories to the Recall Petition are not qualified electors, as their names appear on the Ineligible Voter List provided by the Government Accountability Board. Pursuant to Wis. Stat. § 9.10(2)(e)8, these signatures may not be counted.
- e. At least 114 signatories signed the Recall Petition twice. Pursuant to Wis. Stat. § 9.10(2)(i), these signatures may not be counted.

14. For the foregoing reasons, the Recall Petition fails to meet the mandatory standards outlined in Wis. Stat. § 9.10 and a recall election is unwarranted by controlling law insufficient.

I, Robert Wirch, first being duly sworn upon oath, state that I personally read the above written challenge and that the above allegations are true and correct based on my personal

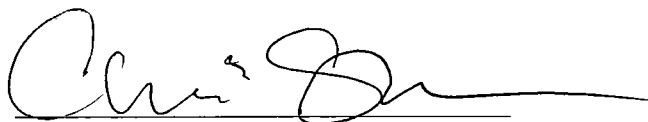
knowledge and, as to those allegations stated on information and belief, I believe them to be true.

Dated this 5th day of May, 2011.



Robert Wirch

Subscribed and sworn to before me this
5th day of May, 2011.



Notary Public, State of Wisconsin

My Commission ~~expires~~ permanent